

Memorandum

U.S. Department of Transportation

Federal Railroad Administration

Date: June 15, 1998 Reply to Att. of: MP&E 98-30

Subject: Two-Hour Rule for Train Air Brakes

From: Edward R. English
Director, Office of Safety Assurance and Compliance

To: Regional Administrators, Deputy Regional Administrators, Motive Power & Equipment Specialists and Inspectors

Questions often arise as to the interpretation of the so-called "two-hour rule." Federal Regulations for air brake testing require that cars that have previously been tested in accordance with Section 232.12, "remain charged" or be retested in accordance with Section 232.12(c)-(j). Based on longstanding administrative interpretation and practice and in the interests of predictability, the Federal Railroad Administration presumes that a brake system is no longer adequately charged if it has been disconnected from a charging device (source of compressed air) for more than two hours before being coupled to locomotives or another source of air. The two-hour period is a nominal amount of time and may be longer or shorter, depending upon the circumstances or location involved, as outlined in the following examples:

When cars are tested from a yard plant and then left standing without an air supply source for more than the nominal two-hour period, the cars must be retested.

When previously tested cars are to be picked up by another train originally assembled elsewhere, the two-hour rule will apply if the cars are not connected to an air supply.

If an en route train is stopped for local pick-ups and set-outs of cars, with the through cars left standing, the permissible time for the cars to be disconnected from an air supply <u>may</u> be extended moderately beyond two hours, to allow for some extra time needed for assembly or disassembly of a train outside a yard area.

If the railroad can reasonably foresee that the yard area or other areas where the cars are located is subject either to vandalism, where the brake system may be disturbed, or to extremely cold weather, where leakage levels may be unacceptable, the time period may be shorter.

The inspector should use good judgement in determining what constitutes a violation